



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH:AXB/LZ
F. #2022R01030

*610 Federal Plaza
Central Islip, New York 11722*

October 27, 2023

By Hand

Joseph W. Murray
185 Great Neck Road, Suite 461
Great Neck, NY 11021
joe@jmurray-law.com

Re: United States v. George Santos
Criminal Docket No. 23-197 (JS) (AYS)

Dear Mr. Murray:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's earlier productions from June 27, 2023 and September 6, 2023. The government renews its request for reciprocal discovery from the defendant.

This discovery is provided under the terms of the Stipulation and Protective Order signed by the defendant and entered on or about June 22, 2023, by United States District Judge Joanna Seybert in the above-captioned matter. See Dkt. No. 29. Please note that the government has designated DOJ-0000353766 to DOJ-0001169113 as Sensitive Discovery Materials, which are subject to additional restrictions.

Further, upon review of the Superseding Indictment, the government observed typographical errors involving the anonymized labels of the individuals referenced in Counts Eleven, Twelve, Thirteen, Fourteen, and Fifteen. The narrative portion of the Company #1 Fraud Scheme provides the correct anonymized labels for these individuals. See Superseding Indictment, Dkt. No. 50 ¶¶ 49–56. Thus, these Counts should appear in the Superseding Indictment as they do below (corrections in **bold** and underlined):

<u>Count</u>	<u>Approximate Date</u>	<u>Description</u>
ELEVEN	October 4, 2022	Email on behalf of Company #1 to Contributor <u>#13</u> falsely stating that funds received from Contributor <u>#13</u> would be used in support of DEVOLDER SANTOS's candidacy for the House.

TWELVE	October 12, 2022	Email on behalf of Company #1 to Contributor #14 falsely stating that funds received from Contributor #14 would be used to independently support DEVOLDER SANTOS's candidacy for the House and that Company #1 was a Section 501(c)(4) social welfare organization that could accept limitless contributions.
THIRTEEN	October 20, 2022	Email on behalf of Company #1 to Contributor #13 falsely stating that funds received from Contributor #13 would be used, in part, to purchase television advertisements supporting DEVOLDER SANTOS's candidacy for the House.
FOURTEEN	October 21, 2022	Text message from DEVOLDER SANTOS to Contributor #14 falsely stating that funds received from Contributor #14 would be used, in part, to purchase television advertisements supporting DEVOLDER SANTOS's candidacy for the House.
FIFTEEN	October 25, 2022	Text message on behalf of Company #1 to Contributor #13 falsely stating that funds received from Contributor #13 would be used, in part, to purchase television advertisements supporting DEVOLDER SANTOS's candidacy for the House.

Finally, in an abundance of caution, the government discloses to the defendant that

[REDACTED]

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Ryan C. Harris
Ryan C. Harris
Anthony Bagnuola
Laura Zuckerwise
Assistant U.S. Attorneys

COREY R. AMUNDSON
Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice

By: /s/ Jacob R. Steiner
Jacob R. Steiner
John P. Taddei
Trial Attorneys

Enclosures:

- 1) Attachment A- Discovery Index
- 2) One encrypted hard drive